

**REMARKS**

This amendment is in response to the Official Action mailed on September 17, 2003. Claims 1, 3, 7, 9, 11, 30, 31, 36, 40, and 67 have been amended. Claims 46-65 remain withdrawn. New claims 66-148 have been added.

In the Drawings, Figure 4 has been amended to add reference numerals 51, 52, 53, 55 and 57. No new matter has been added. Approval of this drawing change is respectfully requested.

In the Specification, the paragraph beginning on page 5, line 33 has been amended to correct a clerical error.

The amendment on page 7 of the specification adds a description of a feature clearly evident from the drawings, but which is not specifically described in the current text. With particular reference to Figure 4, the upper end of sleeve 80 extends through an opening 51 in the upper side of housing 52. This places cap 122 and rod clamp 124 outside the housing for easy access. When these parts are removed, the sealing components inside the sleeve 80 become readily accessible for servicing without having to remove the drive head from the well. The description added to page 7 now identifies oil ring 55 and flinger ring 57 that seal sleeve 80 where it exits the housing. These components are clearly visible in Figure 4, but were not previously mentioned.

The last paragraph on page 7 has been amended to indicate that sleeve 80 extending above housing 52 is threadably coupled to a drive cap, which is evident from Figure 4.

The first full paragraph on page 8 has been amended to indicate that passage 132 delivers lubricant to bearing 88 "and to oil seal 55". Again, this feature is evident from the view of Figure 4. No new matter has been added.

The amendment to the last paragraph on page 9 specifically describes that spring 118 in the embodiment of Figure 8 acts in the same direction as well as well head pressure. This feature is self evident from Figure 8. Radial holes 238 are described more correctly as being for the purpose of draining leaked fluid "away from" the housing, rather than for collection of the fluid "in" the housing. Again, an examination of Figure 8 shows that the holes in question open up outside of the housing, and clearly therefore the amendment is consistent with and supported by the drawing. No new matter has been added.

The new paragraph added to page 10 merely describes the servicing advantage of having the upper end of sleeve 80 extending outwardly from the housing. Again, this feature is clearly evident from all of the views in the drawings, and most clearly from Figure 4. No new matter has been added.

In the claims, claims 1, 3, 7, 9, 11, 30, 31, 36, 40, and 67 have been amended. New claims 66-148 have been added.

As amended, claim 1 now recites a housing having upper and lower openings for receiving the rod therethrough, a rotatable sleeve adapted to concentrically receive a portion of the rod therethrough, "said sleeve being rotatably mounted in said housing and having an upper end passing through said upper opening to extend outwardly of said housing", means "disposed on the upper end of the sleeve" to drivingly connect the sleeve to the polished rod, and "seal means within said sleeve to prevent the escape of well fluids, wherein said means for drivingly connecting said sleeve to said rod are removable from the upper end of the sleeve for servicing of the seal means without removal of the drive head assembly from the well".

Mills, in complete contrast, is directed towards a backspin retarder to prevent destructive reverse spin in drive

head resulting from torque stored in the sucker rod extending down the well. There is neither teaching nor suggestion in Mills of a drive head having the features now recited in claim 1. This is particularly evident from the fact that claim 1 as amended now emphasizes the accessibility for servicing of the seals used to seal the polished rod resulting from the use of a rotatable sleeve that extends above the drive head housing. Mills device makes no use of stuffing box seals whatsoever nor is his device concerned at all with the fluid sealing of a rotating rod and the servicing of the seals used for that purpose.

For these reasons, claim 1 as amended is now clearly and patentably distinguished over Mills.

Claims 3, 7 and 11 have been amended for clarity purposes only. Similarly, claim 9 has been amended to clarify the relationship of the rod clamp and cap member. Claim 30 has been amended to clarify that the drive gear is connected to the drive shaft. Claim 31 has been amended for clarity purposes only. Claims 36, 40 and 67 have been amended to clarify the dependency of these claims.

New claims 68 to 72 depend ultimately from allowed claim 34.

New independent claim 73 is similar in scope to independent claim 1 but refers more specifically to a "stuffing box" inside the tubular drive sleeve. New claims 74 to 95 depend from claim 74. For the reasons stated above with respect to claim 1, claims 73-95 are allowable over the art of record.

New independent claim 96 is similar to claim 1, but is more detailed in that it specifically recites rotary seal means and static seal means disposed within the tubular drive sleeve.

New claims 97 to 108 are dependent from claim 96. For the reasons stated above with respect to claim 1, claims 73-95 are allowable over the art of record.

New independent claim 109 is again similar in scope to claim 1 but recites that the tubular standpipe is "non-rotatable" and that the rotary seal means are in contact with well fluids on one side thereof and with the first annulus on the other side thereof. This claim, and claims 110 to 118 dependent therefrom are directed primarily towards the embodiment of Figure 8 and are respectfully submitted to be allowable for the reasons stated above with respect to claim 1.

New independent claim 119 is similar in scope to allowed claim 43 and is directed towards an externally accessible stuffing box on top of the drive head housing.

New independent claim 120 once again is similar in scope to amended claim 1 and further defines the invention as contemplated by the applicant. New claims 121 to 137 depend from claim 120. New claims 138 to 145 also depend from new claim 120 and are directed towards the backspin retarder forming part of the present invention. For the reasons stated above with respect to claim 1, claims 73-95 are allowable over the art of record.

New claims 146-148 are similar in scope to allowed claims 43-45, except that the term "housing" has been replaced with "tubular drive sleeve".

In view of the foregoing remarks, the application is believed to be in condition for allowance, and early notice to this effect is earnestly solicited. If allowance of this application may be expedited by resolution of simple issues through a telephone conference, the Examiner is welcome to call the undersigned.


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If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

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